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*Counsel for Cadence Innovation LLC,  
PD George Co, Furukawa Electric Company, Ltd.  
and Furukawa Electric North America APD, Inc.*

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

|                                     |                                  |
|-------------------------------------|----------------------------------|
| -----X                              |                                  |
|                                     | :                                |
| <b>In re:</b>                       | : <b>Chapter 11</b>              |
|                                     | :                                |
| <b>DELPHI CORPORATION, et. al.,</b> | : <b>Case No. 05-44481 (RDD)</b> |
|                                     | :                                |
| <b>Debtors.</b>                     | : <b>Jointly Administered</b>    |
| -----X                              |                                  |

**VERIFIED STATEMENT PURSUANT TO RULE 2019 OF  
THE FEDERAL RULES OF BANKRUPTCY PROCEDURE CONCERNING  
MULTIPLE REPRESENTATION OF PARTIES IN INTEREST**

ALSTON & BIRD LLP (“Alston & Bird”), pursuant to Rule 2019 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), files this statement in connection with its representation of four creditors in the above-captioned cases of the debtors and debtors-in-possession (the “Debtors”)<sup>1</sup>, and respectfully states as follows:

<sup>1</sup> The Debtors include: Delphi NY Holding Corporation; Delphi Corporation; ASEC Manufacturing General Partnership; Delphi Medical Systems Colorado Corporation; Delphi China LLC, ASEC Sales General Partnership; Delphi Medical Systems Texas Corporation; Delphi Automotive Systems Overseas Corporation; Delphi Automotive Systems Korea, Inc.; Delphi Automotive Systems International, Inc.; Delphi International Holdings Corp.; Aspire, Inc.; Delphi Connection Systems; Delphi International Services, Inc.; Environmental Catalysts, LLC; Specialty Electronics International, LTD; Delphi Automotive Systems Thailand, Inc.; Delco Electronic Overseas Corporation; Delphi Technologies, Inc.; Delphi Automotive Systems (Holding), Inc.; Exhaust Systems Corporation; Delphi Medical Systems Corporation; Delphi Diesel Systems Corp.; Delphi Integrated Service Solutions, Inc.; Packard Hughes Interconnect Company; Delphi Electronics (Holding) LLC; Delphi Mechatronic Systems, Inc.; Specialty Electronics, Inc.; Delphi Automotive Systems Tennessee, Inc.; Delphi LLC; Dreal, Inc.; Delphi Automotive Systems Risk Management Corp.; Delphi Automotive Systems Services LLC; Delphi Liquidation Holding Company; Delphi Foreign Sales Corporation; Delphi Services Holding Corporation; Delphi Automotive Systems Human Resources LLC; Delphi Automotive Systems Global

1. Names and Addresses of Parties in Interest Represented by Alston & Bird:

Alston & Bird represents four parties in interest in the above-captioned Chapter 11 cases:

A. Cadence Innovation LLC (“Cadence”) as successor in interest to Patent Holding Company is located at 6555 15 Mile Road, Sterling Heights, MI 48312.

B. Furukawa Electric Company, Ltd. (“Furukawa Electric”) is located at 2-3 Marunouchi 2-chome, Chiyoda-ku, Tokyo 100-8322, Japan.

C. Furukawa Electric North America APD, Inc. (“Furukawa North America”) is located at 47677 Galleon Drive, Plymouth, MI 48170.

B. D. PD George Co (“PD George”) is located at 5200 N. 2nd Street, Saint Louis, MO 63147.

2. The Nature of the Claims or Rights of the Parties in Interest and Times of Acquisition Thereof

The above-mentioned claims or rights of Cadence, Furukawa Electric, Furukawa North America and PD George arise by virtue of their contractual, statutory, and/or common law rights with or against the Debtors, and/or by operation of law.

(a) Cadence is the holder of a prepetition general unsecured claim and postpetition administrative priority claim against the Debtors for their past and present direct and willful infringement of three patents owned by Cadence, reflected in Case No. 99-76013 pending in the District Court for the Eastern District of Michigan, Southern Division.

(b) Furukawa Electric is the holder of a prepetition claim against the Debtors for their breach of that certain contract between the Debtors and Furukawa Electric for the manufacture of a power steering sensor known as the Epsilon sensor.

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(Holding) Inc.; Delphi Automotive Systems LLC; Furukawa Wiring Systems LLC; Delphi-Receiveables LLC;

(c) Furukawa North America is the holder of a prepetition unsecured and secured claim that arose out of the ordinary course of the Debtors' prepetition business. Furukawa North America is also the holder of a prepetition claim against the Debtors for their breach of that certain contract between the Debtors and Furukawa North America for the manufacture of a power steering sensor known as the Epsilon sensor.

(d) The claims of PD George, a trade creditor in these Chapter 11 cases, arose out of the ordinary course of the Debtors' prepetition business.

3. Pertinent Facts and Circumstance in Connection with the Employment of Alston & Bird

Alston & Bird has advised Cadence, Furukawa Electric, Furukawa North America and PD George with respect to this concurrent representation.

4. Claims or Interests Owned by Alston & Bird

As of the time Alston & Bird was retained by the above-mentioned creditors, Alston & Bird held no claim against or interest in the Debtors.

Respectfully submitted, this 22nd day of August 2007.

ALSTON & BIRD LLP

/s/ Dennis J. Connolly  
DENNIS J. CONNOLLY (DC-9932)  
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*Counsel for Cadence Innovation LLC, PD  
George Co, Furukawa Electric Company, Ltd.  
and Furukawa Electric North America APD, Inc.*

Verification—Alston & Bird LLP

I, Dennis J. Connolly, declare under penalty of perjury that I have read the foregoing statement and that it is true and correct to the best of my knowledge, information, and belief.

ALSTON & BIRD LLP

/s/ Dennis J. Connolly  
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Sworn to and subscribed before me  
this 22nd day of August 2007.

/s/ Beverly A. Raston  
NOTARY PUBLIC

My Commission Expires:

July 14, 2008